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Attorney for Defendant  
STACEY JACOBS

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	No. 2:12-CR-00323 MCE
	)	
Plaintiff,	)	AMENDED
	)	STIPULATION REGARDING
v.	)	EXCLUDABLE TIME PERIODS UNDER
	)	SPEEDY TRIAL ACT; FINDINGS AND
	)	ORDER
STACEY JACOBS	)	
MYRON JACOBS	)	
	)	
	)	
Defendants.	)	

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**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and the defendants, by and through their counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on April 4, 2013.
2. By this stipulation, the defendants now move to continue the status conference until June 13, 2013, and to exclude time between April 4, 2013, and June 13, 2013, under Local Code T4. Plaintiff does not oppose this request.
3. The parties agree and stipulate, and request that the Court find the following:

1 a. The government has represented that the discovery associated with this case  
2 includes approximately 4,423 pages of investigative reports and related documents in electronic  
3 form. All of this discovery has been either produced directly to counsel and/or made available  
4 for inspection and copying.

5 b. Counsel for the defendants desire additional time to consult with their respective  
6 clients, to review the current charges, to conduct investigation and research related to the  
7 charges, to review and copy discovery for this matter, to discuss potential resolutions with their  
8 clients, to prepare pretrial motions, and to otherwise prepare for trial.

9 c. Counsel for the defendants believe that failure to grant the above-requested  
10 continuance would deny them the reasonable time necessary for effective preparation, taking into  
11 account the exercise of due diligence.

12 d. The government does not object to the continuance.

13 e. Based on the above-stated findings, the ends of justice served by continuing the  
14 case as requested outweigh the interest of the public and the defendants in a trial within the  
15 original date prescribed by the Speedy Trial Act.

16 f. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
17 et seq., within which trial must commence, the time period of April 4, 2013, to June 13, 2013,  
18 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]  
19 because it results from a continuance granted by the Court at defendants' request on the basis of  
20 the Court's finding that the ends of justice served by taking such action outweigh the best interest  
21 of the public and the defendants in a speedy trial.

22 4. Nothing in this stipulation and order shall preclude a finding that other  
23 provisions of the Speedy Trial Act dictate that additional time periods are excludable from the  
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period within which a trial must commence.

IT IS SO STIPULATED.

Dated: March 29, 2013

BENJAMIN WAGNER  
U.S. ATTORNEY

by: /s/ David D. Fischer for  
LEE BICKLEY  
Assistant U.S. Attorney  
Attorney for Plaintiff

Dated: March 29, 2013

/s/ David D. Fischer  
DAVID D. FISCHER  
Attorney for Defendant  
STACEY JACOBS


Dated: March 29, 2013

/s/ David D. Fischer for  
TIM PORI  
Attorney for Defendant  
MYRON JACOBS

**ORDER**

IT IS SO ORDERED.

DATED: April 4, 2013

  
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MORRISON C. ENGLAND, JR., CHIEF JUDGE  
UNITED STATES DISTRICT JUDGE